

# EXHIBIT 4

Pursuant to Local Rule 5.3(A), exhibits attached hereto have been redacted to protect the personal privacy of individuals, including dates of birth and social security numbers.

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CHARLES ROBINSON,

Plaintiff,

v.

TELESECTOR RESOURCES GROUP, INC. D/B/A )  
VERIZON SERVICES GROUP, )

Defendant. )

Civil Action No. 04-11964-NG

**AFFIDAVIT OF PATRICK J. STEVENS**

I, Patrick J. Stevens, hereby depose and say as follows:

1. I was born on . 1952.

2. I am currently employed by Verizon Communications Inc. as a Director. During 2001, I was responsible for, among other operations, Verizon's National Market Center – Complex Services Department located in Boston, Massachusetts (the "NMC"). During that time second-level managers Henry ("Hank") Pilat and Claudia D'Amato reported to me.

3. In summary, the NMC was responsible for processing service orders from Competitive Local Exchange Carriers ("CLECs") seeking to use Verizon's networks and facilities in order to service their (the CLECs') customers. Verizon was required to lease to the CLECs parts of Verizon's networks and facilities in order to permit the CLECs to compete with Verizon. In addition, my organization also processed requests from the Verizon Advanced Data Inc. ("VADI") organization operating under regulatory requirements to process DSL orders in a manner that paralleled order processing for CLECs. VADI was created as a condition of the merger of Bell Atlantic Corp. and GTE that formed Verizon in June 2000.

Redacted

4. During 2000 and into early 2001, the NMC was growing as Verizon implemented new systems in order to service these requests. Over time, the mechanisms and procedures for processing orders from CLECs was streamlined and the systems used for those activities became more automated. As a result, the workload decreased significantly, reducing the number of service representatives required to input orders, correct errors, and perform other duties. In or around June 2000 we anticipated that we would reduce the number of service representatives significantly. Accordingly, in or around September 2001, the NMC reduced its service representative ranks from approximately 160 to 118.

5. As result of the planned reduction of service representative staff, the Wholesale Services management team of which I was a part made the decision to reduce the number of NMC Team Leaders as well. In or around June 2001, I advised Pilat and D'Amato that they would be required to eliminate one Team Leader position, and that they would need to determine which eleven of the twelve Team Leaders to retain.

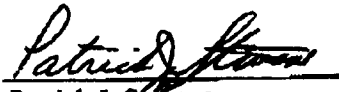
6. In late June or early July 2001, I attended a meeting with the Team Leaders regarding the upcoming reduction in force. During the meeting, I advised the Team Leaders that one of their positions was going to be eliminated and asked for any questions. At the meeting the Team Leaders were also advised to update their internal Verizon resumes to reflect their recent accomplishments, as those resumes would be considered in the selection process. I told the Team Leaders to take this process seriously and to spend some time working on their resumes to ensure that they accurately described their recent accomplishments.

7. In or around late July 2001, Pilat and D'Amato advised me that, based on the resumes and their personal knowledge of the twelve Team Leaders, they had determined that Charles Robinson was the least valuable member of the Team Leader staff, and consequently

would not be selected for one of the remaining eleven Team Leader positions. I approved their decision.

8. At no time did I become aware of any information to suggest that Pilat and/or D'Amato considered Mr. Robinson's age in this decision. Nor did I consider Mr. Robinson's age in concurring with Pilat and D'Amato's decision not to select Mr. Robinson for one of the remaining positions.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 21<sup>st</sup> DAY  
OF OCTOBER, 2005.

  
Patrick J. Stevens